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*Attorneys for Defendant
HSBC Bank USA, NA*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Joey Salmon,

Plaintiff,

v.

Experian Information Solutions, Inc. and
HSBC Bank USA, NA,

Defendants.

Case No. 2:22-cv-01550-CDS-EJY

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, Defendant HSBC Bank USA, NA (“HSBC”) and Plaintiff Joey Salmon (“Plaintiff,” collectively the “Parties”), by and through their respective attorneys, hereby agree to extend the time for HSBC to answer or otherwise respond to Plaintiff’s Complaint, through and until November 1, 2022.

HSBC and Plaintiff are investigating and discussing the allegations and underlying facts of this matter, and the requested extension will allow the parties the opportunity to attempt resolution without the need for further litigation.

This Motion is HSBC’s first request for an extension of its response deadline in this

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1 matter. This request is made in good faith and not for the purpose of delaying these proceedings.

2 Dated: October 7, 2022

Respectfully submitted,

3 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

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5 By: /s/ J Christopher Jorgensen

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9 *Attorneys for Defendant*
10 *HSBC Bank USA, NA*

11 Dated: October 7, 2022

KIND LAW

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13 By: /s/ Michael Kind

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17 Dated: October 7, 2022

FREEDOM LAW FIRM, LLC

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19 By: /s/ Gerardo Avalos

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Attorneys for Plaintiff Joey Salmon

24 **ORDER**

25 **IT IS SO ORDERED.**

26 Raymond J. Zouchak
UNITED STATES MAGISTRATE JUDGE

27 DATED: October 11, 2022